

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division

In Re:	:	
	:	
LINDA M. ARMELLINO	:	CASE NO 20-12475-BFK
MICHAEL J. ARMELLINO	:	Chapter 11
	:	
Debtors	:	
	:	

INTERIM APPLICATION FOR FEES AND EXPENSES

COMES NOW counsel for the Debtors, Richard G. Hall, and applies for an order authorizing payment of his fees and expenses, and in support thereof states as follows:

1. This case began as two separate Chapter 11 proceedings. The case of Linda Amellino was filed on November 6, 2020, and the case of Michael Armellino (20-12579-BFK) was filed on November 23, 2020. The two cases were substantively consolidated under the current case number by an order of the Court entered on February 18, 2021, (Dkt. 44). This is the second interim application in either case.

2. The applicant served as the Debtors' counsel throughout the chapter 11 proceeding(s) from the day they were filed; the application for appointment as debtor's counsel in the case of Linda Armellino was filed on November 6, 2020, and was approved by an order entered by this court on December 16, 2020, and the application for appointment as the debtor's counsel in the case of Michael Armellino was filed on November 24, 2020, 2020, and was approved by an order entered on December 16, 2020; authorization

for all fees and expenses applied for herein is sought pursuant to Section 330.

3 On July 28, 2021 the Court entered an order authorizing counsel's First Interim Fee Application in the amount of \$70,907.70. This included all work done up to June 30, 2021. Since then, the applicant has continued as the Debtors' counsel, during which two properties of the estate were sold, a Plan and two Disclosure Statements were filed, another Disclosure Statement was prepared, and numerous other tasks were completed, all of which put the Debtors in a position to obtain confirmation of their Plan and the consummation of their case.

4. The rate of the applicant is consistent with the customary compensation charged by other comparably skilled practitioners in this Court.

5. The applicant is billing for a total of 90.10 hours. The attached Certification details the time applied for by task. The total amount being applied for is \$43,153.60, including attorney's time for \$42,987.50, and expenses of \$166.10.

6. While the applicant has filed a motion to withdraw as the Debtors' counsel, the applicant believes it is likely that the creditors would accept the Debtors' Plan, and that the case would be administered quickly and closed, without more than \$20,000.00 in additional fees.

WHEREFORE your applicant prays that the Court approve this application for attorney's fees in the amount of \$43,153.60 for 90.1 hours of representation, expenses of \$166.10, and for such other relief as may be needed.

/s/ Richard G. Hall
Richard G. Hall
Counsel for the Debtors
601 King Street
Suite 301
Alexandria, Virginia, 22314
VA Bar No. 18076
(703)256-7159

CERTIFICATE OF SERVICE

I hereby certify that on February 16, 2022, a true copy of this Motion and Certification was mailed to those parties on the attached service list, the Debtors at 5811 Hampton Forest Way, Fairfax, VA, 22030, and also served on the United States Trustee via ECF.

/s/ Richard G. Hall

